

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |                                      |
|--|---|--------------------------------------|
| <b>In re:</b>  | ) |                                      |
| <b>Fairfield Sentry Limited, et al.,</b>   | ) | <b>Chapter 15 Case</b>               |
| <b>Debtors in Foreign Proceedings.</b>   | ) | <b>Case No. 10-13164 (SMB)</b>       |
|  | ) | <b>Jointly Administered</b>          |
| <b>Fairfield Sentry Limited (In<br/>Liquidation), et al., acting by<br/>and through the Foreign<br/>Representatives thereof,</b>   | ) |                                      |
| <b>Plaintiffs,</b>   | ) | <b>Adv. Pro. No. 10-03496 (SMB)</b>  |
| <b>-against-</b>   | ) | <b>Administratively Consolidated</b> |
| <b>Theodoor GGC Amsterdam, et al.,<br/>Defendants.</b>   | ) |                                      |
| <b>This declaration applies to the<br/>adversary proceedings listed in<br/>Appendix A to Defendants'<br/>Consolidated Reply<br/>Memorandum of Law<br/>in Further Support of<br/>Defendants' Renewed Motion to<br/>Dismiss, dated June 19, 2020</b> | ) |                                      |

**ATTORNEY DECLARATION OF CHRISTINE M. JORDAN  
IN FURTHER SUPPORT OF DEFENDANTS' RENEWED MOTION TO DISMISS**

I, Christine M. Jordan, hereby declare under penalty of perjury as follows:

1. I am duly licensed and admitted to practice law in the State of New York, and I am an associate with the law firm of Cleary Gottlieb Steen & Hamilton LLP, counsel for HSBC Institutional Trust Services (Asia) Limited, Robinson and Company, Murdoch and Company, Republic Nominees Limited (f/k/a HSBC Private Banking Nominee 1 (Jersey) Limited), HSBC Securities Services (Luxembourg) S.A., HSBC Private Bank (C.I.) Limited (f/k/a HSBC Private Bank (Guernsey) Limited), Republic Nominees Limited, HSBC Private Bank (Suisse) S.A., HSBC Bank USA, N.A., HSBC Trust Company AG (f/k/a HSBC Guyerzeller Trust Company

AG), HSBC Latin America Holdings (UK) Limited (successor-in-interest to HSBC Securities (Panama) S.A.), HSBC International Trustee Limited, Somers Nominees (Far East) Limited, and HSBC Bank Bermuda Limited. I respectfully submit this declaration as a supplement to the Consolidated Reply Memorandum of Law in Further Support of Defendants' Renewed Motion to Dismiss in the above-captioned proceedings.

2. Attached hereto as Exhibits A-B, for the Court's convenience, are true and correct copies of the following documents:

| <u>Ex.</u> | <u>Document</u>   |
|------------|---|
| A          | Custodian Agreement, Fairfield Sentry Limited and Citco Bank Nederland N.V. Dublin Branch and Citco Global Custody N.V., July 3, 2006               |
| B          | Brokerage and Custody Agreement, Fairfield Sigma Limited and Citco Bank Nederland N.V. Dublin Branch and Citco Global Custody N.V., August 12, 2003 |

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2020, at New York, New York.

/s/ Christine M. Jordan

CHRISTINE M. JORDAN